

# Federal Defenders OF NEW YORK, INC.

Southern District  
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March 25, 2020

**BY ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re:** United States v. Peter Bright,  
19 Cr. 521 (PKC)

Dear Judge Castel:

We write to respectfully request that the Court extend the 14-day period for filing a motion for a judgment of acquittal pursuant to Rule 29 of the Federal Rules of Criminal Procedure. The current filing deadline is March 30, 2020. The Court may extend the time for filing on its own or for good cause on a party's motion. Fed. R. Cr. P. 45(b)(1).

On March 15, 2020, a day before the verdict was rendered in the above captioned matter, Federal Defenders of New York instituted remote operations in light of the coronavirus pandemic. Two days earlier, on March 13, 2020, the MCC, where Mr. Bright is detained, announced a 30-day suspension of all visits including legal visits. Furthermore, we understand that Mr. Bright's housing unit is now under quarantine after an inmate in his unit tested positive for COVID-19. These facts have made it next to impossible to communicate with Mr. Bright and to discuss procedural matters with him. In light of the complications generated by the national health crisis, we respectfully request that the Court extend the Rule 29 filing deadline by 45 days to May 15, 2020.

Respectfully submitted,

/s/  
Amy Gallicchio  
Zawadi Baharanyi  
Assistant Federal Defender  
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cc: AUSA Alexander Li